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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 6:24-cr-00019-MTK

Plaintiff,

SENTENCING MEMORANDUM

v.

GARY WADE RONNING,

Defendant.

Defendant Gary Wade Ronning, through his attorneys, Tihanne K. Mar-Shall and Michael Benson, submits this Sentencing Memorandum in anticipation of his upcoming sentencing hearing on June 25, 2025. On January 22, 2025, Mr. Ronning pled guilty to Count Two of the Indictment, which charges him with attempted coercion and online enticement of a minor, in violation of 18 U.S.C. § 2422(b). Mr. Ronning is respectfully asking this Court to sentence him to 130 months imprisonment followed by five years of supervised release.

Dated: June 18, 2025.

/s/ Tihanne K. Mar-Shall
Tihanne K. Mar-Shall, OSB 224504

/s/ Michael Benson
Michael Charles Benson